

### **REMARKS**

The Non-Final Office Action mailed August 31, 2010 has been received and reviewed. Claims 1-5, 8-9, 11-17, 19 and 21-34 are pending in the subject application. All claims stand rejected. Each of claims 1-3, 9, 11-13, 15, 22-32, and 34 has been amended herein. It is submitted that no new matter has been added by way of the present amendments. Reconsideration of the subject application is respectfully requested in view of the above amendments and the following remarks.

#### **Claims Objections**

Claim 15 has been objected to due to an inadvertent typographical error. This inadvertent error has been corrected in the amendments above. Accordingly, the objection to claim 15 is believed to have been overcome.

#### **Rejections based on 35 U.S.C. § 112**

Claims 15-21 have been rejected under 35 U.S.C. § 112, second paragraph, as ostensibly being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Applicants submit that claims 18 and 20 were previously canceled from the subject application and are no longer pending. Thus, Applicants assume that the indicated rejection applies only to claims 15-17, 19, and 21 and have not herein addressed the 35 U.S.C. § 112 rejection of claims 18, and 20.

Applicants have amended independent claim 15 to cure the inadvertent antecedent basis issues indicated by the Office. Accordingly, Applicants respectfully submit that amended independent claim 15 and claims 16-17, 19, and 21 that depend therefrom particularly point out and distinctly claim the subject matter which Applicants regard as the invention. As such,

Applicants respectfully request withdrawal of the 35 U.S.C. § 112 rejection of amended independent claim 15 and claims 16-17, 19, and 21.

**Rejections based on 35 U.S.C. § 101**

Claims 1-14, 22-30, and 34 have been rejected under 35 U.S.C. § 101 because the claimed invention is ostensibly directed toward non-statutory subject matter. As an initial matter, it is submitted that claims 6, 7, and 10 were previously cancelled from the subject application and are no longer pending. Thus, Applicants assume that the indicated rejection applies only to claims 1-5, 8, 9, 11-14, 22-30, and 34 and have not herein addressed the 35 U.S.C. § 101 rejection of claims 6, 7, and 10.

Independent claims 1, 22, 28, and 34 are amended herein to more clearly recite computer-executable instructions “tangibly embodied” on computer-readable storage media and executed by a computing device having a processor, as suggested by the Office. *Office Action of 08/31/2010* p. 7, sec. 22. Accordingly, Applicants submit that amended independent claims 1, 22, 28, and 34 are directed to statutory subject matter and respectfully request withdrawal of the 35 U.S.C. § 101 rejection thereof. Each of claims 2-5, 8-9, 11-14, 23-27, and 29-30 depends, either directly or indirectly, from one of independent claims 1, 22, and 28. As such Applicants respectfully submit that these claims are also directed to statutory subject matter for at least the reason of their dependence on one of independent claims 1, 22, and 28. Accordingly, withdrawal of the 35 U.S.C. § 101 rejection of claims 2-5, 8-9, 11-14, 23-27, and 29-30 is respectfully requested as well.

**Rejections under 35 U.S.C. § 103 over Hanagan in view of von Kaenel**

Claims 1-5, 8-9, 11-17, 19 and 21-34 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Publication No. 2004/0133487 to Hanagan et al. (hereinafter “Hanagan”) in view of U.S. Patent No. 7,107,285 to von Kaenel et al. (hereinafter “von Kaenel”). As a *prima facie* case of obviousness cannot be established for the rejected claims based upon the asserted references, whether alone or in combination, Applicants respectfully traverse the rejection, as hereinafter set forth.

**Independent claim 1**

Independent claim 1, as currently amended recites “a bulk component that periodically, concurrently processes in a bulk mode, a plurality of eligible accounts with a set of dependent tasks, wherein a first set of eligible accounts is fetched for bulk processing based on one or more first preset criteria for a first task in the set of dependent tasks, and a second set of eligible accounts is fetched for bulk processing based on one or more second preset criteria for a second task in the set of dependent tasks, wherein...” the first and second sets of eligible accounts, tasks, and preset criteria are not identical, and “wherein the tasks...include[s] accounting operations to be completed for the accounts in the plurality of eligible accounts.” See *Applicants’ Specification* at p. 6, lines 9-17 and p. 1, lines 16-18. Applicants respectfully submit that Hanagan and von Kaenel do not teach or suggest performing bulk processing of a set of dependent tasks that each includes a different set of criteria by which a different set of eligible accounts are selected for processing, as recited by amended independent claim 1.

In contrast, Hanagan describes that raw usage event data can be collected and formatted into records. *Hanagan* at ¶¶ [0239] and [0247]. These records can then be filtered using user-defined criterion for selecting the records based on characteristics of the records. *Id.*

at ¶ [0252]. The records described by Hanagan are formatted event data, not accounts as recited by amended independent claim 1. Applicants submit that the event data might be useable during processing of accounts to update the accounts or otherwise inform account characteristics/states but, the event data is not the same as an account. As such, Hanagan does not describe fetching sets of eligible accounts based on preset criteria but, rather, describes filtering formatted event data. Von Kaenel fails to cure these deficiencies of Hanagan.

Hanagan and von Kaenel also fail to teach or suggest fetching different sets of eligible accounts for each task to be performed in bulk processing. Applicants submit that Hanagan and von Kaenel describe batch/bulk processing of large quantities of data but, do not describe such processing on sets of eligible accounts that vary with the task being performed in an execution of bulk processing, e.g. bulk processing includes processing of a plurality of tasks and processing of each task is completed on a set of eligible accounts that is specific to that task.

Independent Claims 15, 22, 28, and 31

Independent claims 15, 22, 28, and 31, as currently amended, recite features similar to those described above with respect to amended independent claim 1, such as, fetching first and second sets of eligible accounts, and tasks including unique sets of criteria for selecting eligible accounts for processing of the respective task. Accordingly, Applicants respectfully submit that the remarks provided above for amended independent claim 1 apply equally to amended independent claims 15, 22, 28, and 31.

Independent Claims 32 and 34

Independent claims 32 and 34, as currently amended, each recite a similar feature that includes processing an errored account *with up to a predetermined threshold number of attempts to resolve the error*. Applicants respectfully submit the Hanagan and von Kaenel do not

teach or suggest this feature of amended independent claims 32 and 34. Independent claim 34 as previously presented included this feature, however, the Office did not specifically indicate that Hanagan or von Kaenel describe such a feature. *See Office Action of August 31, 2010* at pgs. 22-24. Additionally, in a previous Office Action, the Office indicated with respect to rejection of independent claim 34 that Hanagan does not specifically teach a bulk component processing the errored account with up to a predetermined threshold number of attempts to resolve the errored account. *See Office Action of April 27, 2010* at p. 24, lines 4-5. Thus, Applicants respectfully submit that Hanagan and von Kaenel fail to teach or suggest processing an errored account with up to a predetermined threshold number of attempts to resolve the error, as recited by amended independent claims 32 and 34.

As such, it is respectfully submitted that a *prima facie* case of obviousness cannot be established for amended independent claims 1, 15, 22, 28, 31, 32, and 34 based upon Hanagan and von Kaene, either alone or in combination. Accordingly, Applicants submit that amended independent claims 1, 15, 22, 28, 31, 32, and 34 are not obvious over Hanagan in view of von Kaenel. As such, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of amended independent claims 1, 15, 22, 28, 31, 32, and 34. Amended independent claims 1, 15, 22, 28, 31, 32, and 34 are believed to be in condition for allowance and such favorable action is hereby respectfully requested.

Each of claims 2-5, 8-9, 11-14, 16-17, 19, 21, 23-27, 29-30, and 33 depends, either directly or indirectly, from one of amended independent claims 1, 15, 22, 28, and 32. Thus, Applicants respectfully submit that that a *prima facie* case of obviousness cannot be established for dependent claim 2-5, 8-9, 11-14, 16-17, 19, 21, 23-27, 29-30, and 33 based upon Hanagan and von Kaenel, either alone or in combination, for at least the above-cited reasons and

based on their dependency on allowable independent claims. Accordingly, Applicants respectfully submit that dependent claims 2-5, 8-9, 11-14, 16-17, 19, 21, 23-27, 29-30, and 33 are not obvious over Hanagan in view of von Kaenel and request withdrawal of the 35 U.S.C. § 103(a) rejection thereof.

### **CONCLUSION**

For at least the reasons stated above, claims 1-5, 8-9, 11-17, 19, and 21-34 are believed to be in condition for allowance. Applicants respectfully request withdrawal of the pending rejections and allowance of the claims. If any issues remain that would prevent issuance of this application, the Examiner is urged to contact the undersigned – 816-559-2564 or areed@shb.com (such communication via email is herein expressly granted) – to resolve the same.

It is believed that no fee is due. However, if this belief is in error, the Commissioner is hereby authorized to charge any amount required to Deposit Account No.19-2112, referencing attorney docket number 306387.01/MFCP.149170.

Respectfully submitted,

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